Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the *Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000*, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and 44 CFR Part 201 – Mitigation Planning, Interim Final Rule (the Rule), published February 26, 2002.

SCORING SYSTEM

- N Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.
- S Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

Example

Assessing Vulnerability: Overview

Requirement §201.6(c)(2)(ii): [The risk assessment **shall** include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.

| shau incidae an overali summary of each nazara and | i iis impaci on me commi | muy. | | |
|---|--------------------------|--|-----|-----|
| | Location in the | | SCO | ORE |
| | Plan (section or | | N | c |
| Element | annex and page #) | Reviewer's Comments | N | 3 |
| A. Does the plan include an overall | Section II, pp. 4-10 | The plan describes the types of assets that are located within geographically defined | | |
| summary description of the jurisdiction's vulnerability to each hazard? | | hazard areas as well as those that would be affected by winter storms. | | ✓ |
| B. Does the plan address the impact of | Section II, pp. 10- | The plan does not address the impact of two of the five hazards addressed in the plan. | | |
| each hazard on the jurisdiction? | 20 | Required Revisions: | | |
| | | Include a description of the impact of floods and earthquakes on the assets. | | |
| | | Recommended Revisions: | ✓ | |
| | | This information can be presented in terms of dollar value or percentages of damage. | | |
| | | SUMMARY SCORE | ✓ | |

Local Mitigation Plan Review and Approval Status

| Jurisdiction: | Title of Plan: | Date of Plan: |
|-----------------------------|------------------------------|------------------|
| Hill County | Pre-Disaster Mitigation Plan | August 2005 |
| Local Point of Contact: | Addres | |
| Ronald Knudson | 315 4 th | Street |
| Title: | Havre, | MT 59501 |
| Disaster Emergency Services | | |
| Agency: | | |
| Hill County | | |
| Phone Number: | E-Mail: | |
| 406-265-5481 | knudso | on@co.hill.mt.us |

| State Reviewer: | Title: | Date: |
|-----------------|--------|------------------|
| Kent Atwood | SHMO | January 23, 2006 |

| FEMA Reviewer: Ken Crawford Jennifer Fee KC Collins | Title: Mitigation Specialist Planner Planner | Date: February 15, 2006 March 7, 2006 March 20, 2006 |
|---|--|---|
| | | Walti 20, 2006 |
| Date Received in FEMA Region VIII | January 30, 2006 | |
| Plan Not Approved | | |
| Plan Approved | xxx | |
| Date Approved | March 29, 2006 | |

| | | NFIP Status* | | |
|---|---|--------------|-----|--------------|
| Jurisdiction: | Y | N | N/A | CRS Class |
| 1. Hill County | X | | | |
| 2. City of Havre | X | | | |
| 3. Town of Hingham | X | | | |
| 4. | | | | |
| 5. [ATTACH PAGE(S) WITH ADDITIONAL JURISDICTIONS] | | | | |

| * Notes: | Y = Participating | | N = Not Participating | N/A = Not Mapped | | |
|---|--|---|--|--|------------|-----------|
| LOCAL MIT | IGATION PLAN | REVIE | W SUMMARY | | | |
| The plan cannot be a | pproved if the plan has not been | formally adop | ted. | Multi-Jurisdictional Risk Assessment: §201.6(c)(2)(iii) | | Х |
| "Satisfactory" in order Elements of each req A "Needs Improvement | ludes separate elements. All eler for the requirement to be fulfilled uirement are listed on the followint" score on elements shaded in from passing. Reviewer's commprovement" score. | d and receive ng pages of th gray (recomm | a score of "Satisfactory." ne Plan Review Crosswalk. nended but not required) will | 3201.3(0)(2)(11) | | |
| SCORING SYSTEM | | | | Mitigation Strategy | N | s |
| Please check one of t | the following for each requiremen | nt. | | Local Hazard Mitigation Goals: §201.6(c)(3)(i) | | Х |
| | nent: The plan does not meet th nments must be provided. | e minimum fo | r the requirement. | Identification and Analysis of Mitigation Actions: §201.6(c)(3)(ii) | | х |
| | e plan meets the minimum for the | e requirement | Reviewer's comments are | Implementation of Mitigation Actions: §201.6(c)(3)(iii) | | Х |
| encouraged, bu | ut not required. | | | Multi-Jurisdictional Mitigation Actions: | | х |
| Prerequisite(s) (Ch | neck Applicable Box) | NOT MET | MET | §201.6(c)(3)(iv) | | Α |
| Adoption by the Loc §201.6(c)(5) OR | al Governing Body: | | Х | Plan Maintenance Process | N | s |
| 3=00(0)(0) | | | | Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i) | | Х |
| | Plan Adoption: §201.6(c)(5) AND | | х | Incorporation into Existing Planning Mechanisms: §201.6(c)(4)(ii) | | Х |
| Multi-Jurisdictional F §201.6(a)(3) | Planning Participation: | | х | Continued Public Involvement: §201.6(c)(4)(iii) | | Х |
| Planning Process | | N | s | Additional State Requirements* | N | s |
| Documentation of thand §201.6(c)(1) | ne Planning Process: §201.6(b) | | Х | Insert State Requirement | | |
| and 9201.6(c)(1) | | | | Insert State Requirement | | |
| Risk Assessment | | N | S | Insert State Requirement | | |
| Identifying Hazards: | §201.6(c)(2)(i) | | Х | | | |
| Profiling Hazards: §2 | 201.6(c)(2)(i) | | Х | LOCAL MITIGATION PLAN APPROVAL STA | THE | |
| Assessing Vulnerab | ility: Overview: §201.6(c)(2)(ii) | | Х | LOCAL MITIGATION FLAN AFFICOVAL STA | 1103 | |
| §201.6(c)(2)(ii)(A) | ility: Identifying Structures: | Х | | F | PLAN NOT A | PPROVED |
| Losses: §201.6(c)(2 | | X | | | DI AN A | \PPROVED |
| Assessing Vulnerab Trends: §201.6(c)(2) | ility: Analyzing Development ()(ii)(C) | X | | | FLAN | II FROVED |

*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

See Reviewer's Comments

PREREQUISITE(S)

Adoption by the Local Governing Body

Requirement §201.6(c)(5): [The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).

| the furtsuretion requesting approval of the plan (e.g., e | ity Council, County | Commissioner, Trion Council). | | |
|---|---------------------|-------------------------------|-----|-----|
| | Location in the | | SCO | ORE |
| | Plan (section or | | NOT | |
| Element | annex and page #) | Reviewer's Comments | MET | MET |
| A. Has the local governing body adopted the plan? | | N/A | | |
| B. Is supporting documentation, such as a resolution, included? | | N/A | | |
| | | SUMMARY SCORE | | N/A |

Multi-Jurisdictional Plan Adoption

Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.

| - | Location in the | | SCC | ORE |
|---|---------------------|--|-----|-----|
| | Plan (section or | | NOT | |
| Element | annex and page #) | Reviewer's Comments | MET | MET |
| A. Does the plan indicate the specific jurisdictions represented in the plan? | Page 1 Authority | Hill County and the incorporated towns of Hingham and Havre are represented in the PDMP. These jurisdictions are also represented in the Community Wildfire Protection Plan (CWPP). | | Х |
| B. For each jurisdiction, has the local governing body adopted the plan? | Page 1 | Hill County and the incorporated towns of Hingham and Havre have adopted this pre-disaster mitigation plan." These jurisdictions have also adopted the Community Wildfire Protection Plan (CWPP). | | Х |
| C. Is supporting documentation, such as a resolution, included for each participating jurisdiction? | Appendix A | Resolution #05-2036 signed on 9/30/2005 for Hill County, Resolution # 145 signed on 10/13/2005 for the town of Hingham, and Resolution # 3463 signed on November 8, 2005 for the City of Havre are presented in Appendix A. | | Х |
| | | SUMMARY SCORE | | Х |

Multi-Jurisdictional Planning Participation

Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.

| | Location in the | | SCC | ORE |
|--|-------------------|--|-----|-----|
| | Plan (section or | | NOT | |
| Element | annex and page #) | Reviewer's Comments | MET | MET |
| A. Does the plan describe how each jurisdiction | Pages 7-8 | The PDM planning process was initiated by preparing a contact list | | Χ |

March 2004

| participated in the plan's development? | Appendix B | of individuals whose input was needed to help develop the plan. County Level participants included elected officials, the DES coordinator, County Health and Sheriff's Dept. State Agencies were also engaged. Stakeholder interviews and meetings were also a component of the planning process. Two public meetings, one in Hingham and the other in Havre on the same day Jan. 20, 2005, were conducted to gather information. City Council and Commission meetings (open to the public) adopting the plan gave the public the opportunity to comment on the final version of the plan. Appendix B indicates the project participants, meeting notes, and how each jurisdiction participated in the planning process. | |
|---|------------|--|---|
| | | SUMMARY SCORE | Χ |

PLANNING PROCESS: §201.6(b): An open public involvement process is essential to the development of an effective plan.

Documentation of the Planning Process

Requirement §201.6(b): In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include: (1) An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;

- (2) An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and
- (3) Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.

Requirement §201.6(c)(1): [The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.

| | | Location in the | | SCO | DRE |
|-----|---|------------------------------------|--|-----|-----|
| Ele | ment | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. | Does the plan provide a narrative description of the process followed to prepare the plan? | Pages 7-8 Appendix B | A narrative description of the planning process is well documented and includes notes, agendas and sign-in sheets for both public meetings. | | X |
| B. | Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?) | Pages 1, 7 Appendix B | The local DES Coordinator, Montana State Hazard Mitigation Officer, elected officials; city and county personnel and the local communities participated in the development of the plan. Appendix B presents the Hill County contact lists all participating jurisdictions were represented. Meeting summaries, briefings, and sign-in sheets are included in the plan. | | Х |

| C. | Does the plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?) | Pages 7-8, 35 Appendix B | The plan describes in great detail how the public was involved. Two public meetings were conducted during the planning process. The purposes of the public meetings were to gather information on past hazards, update the list of critical facilities, and develop and prioritize mitigation goals. Appendix B contains meeting summaries, sign-in sheets, local news releases and articles of the planning process. | Х |
|----|---|-----------------------------|---|---|
| D. | Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process? | Pages 7-8, 35 Appendix B | Two meetings were held that were open to the public and to neighboring communities and other interested parties. A press release was distributed to local and regional newspapers including the Havre Daily News and the Great Falls Tribune. Local radio stations received copies of the press release as public service announcements. | Х |
| E. | Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information? | Pages 10, 36 | The plan utilized and reviewed several data sources including: DES, FEMA, the U.S Coast Guard, the National Weather Service, historical newspapers articles, and interviewing local experts. | Х |
| | | | SUMMARY SCORE | Х |

RISK ASSESSMENT: $\S 201.6(c)(2)$: The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.

Identifying Hazards

Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.

| • | Location in the | | SCO | ORE |
|---|------------------------------------|--|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction? | Pages 10, 35 Dams | Each hazard profile provides an excellent description of the hazard potentially impacting the county. | | |
| If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score. Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area. | | The plan includes information for all identified hazards and in most cases the data used is more extensive than that found from readily available on-line resources. For more information refer to SHELDUS (www.sheldus.org). A Flood Insurance Study is available for Hill County, including incorporated cities of Hingham and Havre. http://msc.fema.gov/ . | | X |
| | | The plan indicates on page 32-33 that there are a total of 6 | | |

| SUMMARY SCORE | Χ |
|---|---|
| Online EPA data suggests that there are no toxic release inventory sites in Hill County. Please see http://www.epa.gov/triexplorer/ for more information. | |
| high hazard dams. The National Inventory of Dams appears to indicate that there are also 6 dams in Carbon County and one of them, East Fork Reservoir Dam, does not appear to have an Emergency Action Plan (EAP). The National Dam Safety Act requires that an emergency action plan (EAP) be completed for high hazard dams. Developing an EAP for East Fork Reservoir Dam would be beneficial mitigation strategy. Please see http://crunch.tec.army.mil/nid/webpages/nid.cfm (introduction and download dam data) for National Dam Inventory information. | |

Profiling Hazards

Requirement §201.6(c)(2)(i): [The risk assessment **shall** include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan **shall** include information on previous occurrences of hazard events and on the probability of future hazard events.

| | Location in the | | SCO | ORE |
|---|------------------------------------|--|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan? | Pages 10-35 | The hazard profiles include a narrative section on location and include a table of past occurrences, which lists the geographical location impacted by the identified hazards. | | Х |
| B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan? | Pages 10-35 | The magnitude of past events is highlighted in the hazard profiles indicating the types of structures, livestock and infrastructure damaged. | | Х |
| C. Does the plan provide information on previous occurrences of each hazard addressed in the plan? | Pages 10-35 | Previous occurrences of each type of hazard are addressed in the hazard profiles. The plan includes a discussion as well as tables that list the location, date, type, and comments for past occurrences for all identified hazards. | | X |
| D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan? | Page 42 | Section 3.4.1 on page 42 discusses probability based on past frequencies of events in Table 3-14. The hazard profiles contain a section on hazard frequency, which addresses probability of future events. Within the CWPP, the Individual Community Assessment section contains the ignition risk for each community. | | Х |
| | | SUMMARY SCORE | | Х |

Assessing Vulnerability: Overview

Requirement §201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph

(c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.

| | Location in the | • | SCC | RE |
|---|------------------------------------|---|-----|----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard? | Pages 40-47 CWPP 39-46 | The plan includes a section on vulnerable populations, which discusses vulnerability for each identified hazard. The plan includes excellent maps that depict population in comparison to the floodplain, Transportation Hazards and Cumulative Hazard Area by Census Block. Table 3-15 describes vulnerability in terms of frequency, magnitude, building exposure, societal exposure, critical facilities exposure, and then provides calculations for building \$ risk, societal risk and critical facilities risk. The CWPP also contains great information on vulnerability in terms of community values and vulnerable populations. | | Х |
| B. Does the plan address the impact of each hazard on the jurisdiction? | Pages 10-35, 47 CWPP 39-46 | Previous occurrences of each type of hazard are addressed on pages 10-35. A description of past occurrences can be found in hazard profiles and consists of detailed information including magnitude, duration, location, facilities closures etc. The tables within the history of past includes date and short description of hazard. Table 3-15. The CWPP includes extensive information on the impacts from wildfire on individual communities, including: building stock, land use, ecological issues structures, and vulnerable populations. | | Х |
| | | SUMMARY SCORE | | Χ |

Assessing Vulnerability: Identifying Structures

Requirement §201.6(c)(2)(ii)(A): The plan **should** describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area \dots .

| | Location in the | | SCC |)RE |
|--|------------------------------------|---|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings, infrastructure, and critical facilities located in the identified hazard areas? | Pages 36-38 Appendix E CWPP | The plan includes existing buildings, infrastructure and critical facilities The critical facilities are separated by cities within the county, but the plan does not make a connection to identified hazard areas. The CWPP also describes vulnerability in terms of existing | X | |

| | structures. The CWPP categorizes the intensity of fire hazards from low to high and includes the applicable dollar amount for each structure dependent on the category. | | |
|--|--|---|--|
| | Recommended Revisions for the next update: | | |
| | For [specify hazard or hazards], identify the type and number of existing buildings, infrastructure, and critical facilities within each hazard area. | | |
| | Additional Suggestions: Identify the kinds of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical facilities (e.g., shelters, hospitals, police, and fire stations). | | |
| | Describe the process or method used for identifying existing buildings, infrastructure, and critical facilities. | | |
| | If limited data are available, focus on identifying critical facilities located in the identified hazard areas and identify the collection of data for the remaining buildings and infrastructure as an action item in the mitigation strategy. | | |
| | While not required by the Rule, it is useful to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims. At a minimum, describe in the plan repetitive loss neighborhoods or areas. | | |
| | For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets. | | |
| | Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. | | |
| B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas? | The plan discusses that the local officials do not indicate any future buildings, infrastructure or critical facilities that would be located in identified hazard areas, although mitigation options will be considered in future land use decisions. However the plan indicates that there are hazards that affect the entire County. The plan would benefit from including mitigation opportunities associated with future buildings. | Х | |
| | Recommended Revisions for the five year update: | | |

For [specify hazard or hazards], identify the type and number of **future** buildings, infrastructure, and critical facilities within each hazard area.

Additional Suggestions:

Identify the types of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal buildings), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical facilities (e.g., shelters, hospitals, police, and fire stations).

Information on proposed buildings, infrastructure, and critical facilities, including planned and approved development, may be based on information in the comprehensive or land use plan and zoning maps.

Identify buildings, infrastructure, and critical facilities that are vulnerable to more than one hazard.

Describe the process or method used for identifying future buildings, infrastructure, and critical facilities.

Note any data limitations for determining the type and numbers of future buildings, infrastructure, and critical facilities and include in the mitigation strategy actions for collecting the data to improve future vulnerability assessment efforts.

For a discussion on identifying vulnerable structures and detailed inventories, see *Understanding Your Risks* (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.

Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing.

SUMMARY SCORE

Χ

Assessing Vulnerability: Estimating Potential Losses

Requirement §201.6(c)(2)(ii)(B): [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures

identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate ...

| | Location in the | | SCO | ORE |
|--|------------------------------------|--|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan estimate potential dollar losses to vulnerable structures? | Pages 37, 47-48 CWPP 39-41 | The plan does include potential dollar exposure for buildings within the County in relation to the identified hazards. The map on page 37 depicts the Building Stock Dollar Exposure. The CWPP includes several tables, which lists potential dollar losses to wildfires and categorizes the wildfire hazard from low to high, providing costs for each category. Future losses would have to be addressed to fully satisfy this requirement. Recommended Revisions for the five year update: Include, when resources permit, estimates for structure, contents, and function losses to present a full picture of the total loss for each building, infrastructure, and critical facility. Include a composite loss map to locate high potential loss areas to help the jurisdiction focus its mitigation priorities. | X | |
| | | Note any data limitations for estimating losses and include in the mitigation strategy actions for collecting the data to improve future loss estimate efforts. | | |
| | | For a step-by-step method for estimating losses, see Understanding Your Risks (FEMA 386-2), Step 4. | | |
| | | Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. | | |
| B. Does the plan describe the methodology used to prepare the estimate? | Page 36 | The plan does include the methodology used to prepare the estimates. The estimates were prepared by utilizing data available from the FEMA HAZUS software. | | Х |
| | | Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. | | |
| | | SUMMARY SCORE | Χ | |

Assessing Vulnerability: Analyzing Development Trends

Requirement $\S 201.6(c)(2)(ii)(C)$: [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.

| | Location in the | | SCO | DRE |
|---|------------------------------------|--|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan describe land uses and development trends? | Pages 2, 38-40 | The plan includes a good discussion on Land Use and development trends. This section includes areas that are likely to be developed and provides the land use associated with the development, but development trends are not identified in relation to identified hazards with the exception of wildfire. Although population growth is discussed, it may be helpful to have more detailed projections in relation to identified hazard areas. Recommended Revisions for the five year update: Please provide a discussion on land use and development trends, where it is happening, identify low risk areas, than the County can direct growth to the most viable option for development. Describe existing land use densities in the identified hazard areas. Include population projections and growth in relation to identified hazard areas. | X | |
| | | Additional Suggestions: Overlay a land use map with identified hazard areas. Note any data limitations for determining development trends and include in the mitigation strategy actions for collecting the data to complete and improve future vulnerability assessment efforts. Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing. | | |
| | | SUMMARY SCORE | X | |

Multi-Jurisdictional Risk Assessment

Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.

| | Location in the | | SCO | RE |
|---|------------------------------------|---|-----|----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks? | Pages 10-32 CWPP 31-34 | This requirement was marginally met. The plan does not include a summary of where risks vary by jurisdiction in the hazard profiles specifically; however, the plan does provide specific details on where previous events occurred and highlights event locations in tables throughout the hazard profiles. The CWPP includes Ignition profile, which identifies jurisdictions most at risk to fire hazards. Recommended Revisions: For each jurisdiction, identify and assess all risks that are not common to the entire planning area. Prepare a matrix of the various jurisdictions and the range of hazards to show which risks are common and which are unique. For more information on creating a detailed risk assessment, see Understanding Your Risks (FEMA 386-2), Steps 1 - 4. | | X |
| | 1 | SUMMARY SCORE | | Х |

MITIGATION STRATEGY: \$201.6(c)(3): The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.

Local Hazard Mitigation Goals

Requirement §201.6(c)(3)(i): [The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.

| | Location in the | | SCO | ORE |
|--|------------------------------------|--|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as "eliminate flood damage"; and are based on the risk assessment findings.) | Pages 49-51 CWPP 47-49 | The plan lists nine goals; several of the goals are directly related to mitigation. In addition there is a set of goals in the CWPP. | | х |
| | | SUMMARY SCORE | | Х |

Identification and Analysis of Mitigation Actions

Requirement §201.6(c)(3)(ii): [The mitigation strategy **shall** include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.

| | Location in the | | SC | ORE |
|--|------------------------------------|---|----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard? | Pages 49-51 CWPP 47-49 | All nine mitigation goals include mitigation objectives and actions that are directly related to the mitigation goals. | | Х |
| B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure? | Pages 49-51 CWPP 47-49 | The plan includes one project that addresses reducing effects of hazards on new buildings, which is to create defensible space around communities and private homes. Utilize standard fire protection guidelines for residential development in the Wildland/Urban Interface. This could mean both existing residential and future residential. The CWPP also list the same mitigation projects as the PDMP. Recommended Revision: Consider incorporating into the mitigation strategy the potential role of land use and building codes in reducing losses to new buildings and infrastructure. | | Х |
| C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure? | Pages 49-51 CWPP 47-49 | The plan includes projects that would protect existing buildings and infrastructure. These projects include constructing fast fill water stations and cut or mow vegetation in existing communities. The CWPP also list the same mitigation projects as the PDMP. | | х |
| | | SUMMARY SCORE | | Х |

Implementation of Mitigation Actions

Requirement: $\S 201.6(c)(3)(iii)$: [The mitigation strategy section shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.

| | Location in the | | SCO | ORE |
|---|------------------------|--|-----|-----|
| | Plan (section or | | N | c |
| Element | annex and page #) | Reviewer's Comments | IN | 3 |
| A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?) | Pages 51 CWPP 50-51 | The plan includes the methodology for how the projects were prioritized, using a cost benefit matrix highlighting population and property impacted and cost. The results ranked projects as high, medium and low priority. | | X |

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Jurisdiction: HILL COUNTY, MONTANA

| | | The CWPP also includes methodology for how the projects were prioritized | |
|--|-------------------------------|--|---|
| B. Does the mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?) | Pages 51-52 CWPP 57 | This requirement was marginally met. The plan includes a description of project implementation and generally discusses who would be responsible and states that the projects will be accomplished as resources become available. However no general timeframes are provided. Required Revision for the next update: Prior to next submittal please provide a general timeframe for mitigation projects. For a detailed description of the development of the mitigation | х |
| | | strategy or action plan, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 3. | |
| C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits? | Pages 51, 53-58 CWPP 50-51 | A cost benefit matrix was developed to prioritize the mitigation action. Each project was assigned a high, medium, or low rank for population impacted, property impacted and cost. | Х |
| · | | SUMMARY SCORE | Х |

Multi-Jurisdictional Mitigation Actions

Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.

| | Location in the | | SCO | ORE |
|---|------------------------------------|---|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan? | Pages 53-58 | The plan provides tables on pages 53-58, which highlight the responsible jurisdictions for each action item. All three jurisdictions seeking plan approval are responsible for at least one action item. The CWPP plan also includes the same action items. | | Х |
| | | SUMMARY SCORE | | Х |

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

Requirement §201.6(c)(4)(i): [The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and

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updating the mitigation plan within a five-year cycle.

| | Location in the | | SCO |)RE |
|---|------------------------------------|--|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan describe the method and schedule for monitoring the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?) | Page 59 | The Hill County board of Commissioners will be responsible for monitoring the plan. The DES Coordinator will be responsible for scheduling a meeting of the board of Commissioners; the meeting will be open to the public. A schedule includes three situations that would trigger the review of the plan. | | Х |
| B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?) | Page 59 | The plan review will identify new mitigation projects and evaluate the effectiveness of mitigation priorities and existing programs. The plan will be reviewed every two years, as deemed necessary by knowledge of new hazards, and every five years. | | х |
| C. Does the plan describe the method and schedule for updating the plan within the five-year cycle? | Page 59 | The DES Coordinator will be responsible for the five year plan update of the plan and will have six months to make appropriate changes before submitting it to the board and public for review and approval. Before the end of the five year cycle, the updated plan will be submitted to the State Hazard Mitigation Officer and FEMA for acceptance. | | X |
| | | SUMMARY SCORE | | Х |

Incorporation into Existing Planning Mechanisms

Requirement §201.6(c)(4)(ii): [The plan **shall** include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.

| | Location in the | | SCC | RE |
|--|------------------------------------|---|-----|----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan? | Page 59-60 | The plan does include other plans that the mitigation plan could be incorporated into. The two identified planning mechanisms include: Comprehensive Growth Policy and building codes. | | Х |
| B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate? | Page 59-60 | The plan indicates that within six months of formal adoption of the PDM plan, mitigation goals will be incorporated into the County Comprehensive Growth policy. Meetings of the board will provide an opportunity to report on the progress made on integration of mitigation planning elements. | | Х |
| | | SUMMARY SCORE | | Χ |

Continued Public Involvement

Requirement §201.6(c)(4)(iii): [The plan maintenance process **shall** include a] discussion on how the community will continue public participation in the plan maintenance process.

| | Location in the | | SCO | ORE |
|---|------------------------------------|---|-----|-----|
| Element | Plan (section or annex and page #) | Reviewer's Comments | N | S |
| A. Does the plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?) | Page 60 | Continued public participation is well documented in the plan. The public will have the opportunity to review and update the PDMP. Copies of the plan will be cataloged at all appropriate agencies and the public library. The existence of the plan and location will be publicized in the local newspaper. A series of public meetings will be held prior to each two-year review and five-year update. The DES coordinator will be responsible for publicizing the meetings through newspapers and radio. | | Х |
| | | SUMMARY SCORE | | Х |